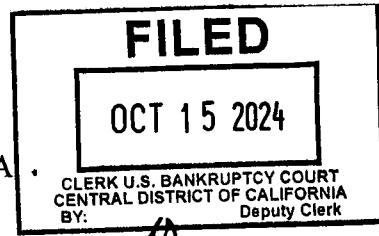


UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA



SYDNEY L SMITH

Plaintiff

-vs-

THE LITIGATION PRACTICE GROUP P.C.,

Defendant

8:23-bk-10571-SC

INJUNCTIVE RELIEF SOUGHT MOTION TO OBJECT TO DEFENDANTS
OBJECTION TO PROOF OF CLAIM

I, SYDNEY SMITH, of MENTOR, in LAKE County, Ohio, MAKE OATH AND SAY THAT:

1. DEFENDANT UNJUSTLY TOOK MONEY FROM ME MONTHLY TOTALLYING 3394.08 WHICH WAS TO BE USED FOR DEBT RELIEF FROM CREDITORS AND NEVER PROVIDED THE SERVICES.
2. DEFENDANT NOT ONLY TOOK 3394.08 FROM ME, BUT THEY NEVER PERFORMED THE SERVICES I SIGNED INTO CONTRACTUAL AGREEMENT FOR.
3. DEFENDANTS MOTION TO OBJECT TO MONIES OWED IS UNJUST AS I AM AN UNSECURED CREDITOR WHO PAID FOR A SERVICE FROM DEFENDANT THAT WAS NEVER RECEIVED.
4. IN EXHIBIT A I HAVE ATTACHED THE AGREEMENT BETWEEN ME AND THE LITIGATION PRACTICE GROUP FOR THEIR SERVICES IN DEBT RELIEF.
5. IN EXHIBIT B I HAVE ATTACHED BANK STATEMENTS WITH LPG TAKING ELECTRONIC PAYMENTS FROM MY BANK ACCOUNT IN THE AMOUNTS OF 565.68 FOR A TOTAL OF 6 MONTHS EQUALLING A TOTAL OF 3394.08.

Affidavit

Page 2 of 3

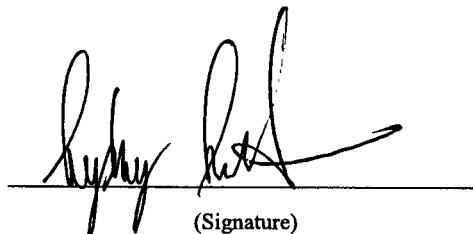
6. DEFENDANT FILED CHAPTER 11 BANKRUPTCY TO AVOID PAYING ME AND OTHERS MONEY BACK THAT THEY SCAMMED US OUT OF.
7. DEFENDANT OWES ME 3394.08 FOR SERVICES THEY WERE TO CONTRACTUALLY PROVIDE, BUT DID NOT PROVIDE.
8. DEFENDANT WAS CONTRAULLY MY ATTORNEY AGAINST ALL OF MY CREDITORS. DEFENDANT WAS TO FIGHT ANY LAWSUITS AGAINST ME AS WELL AS INVALIDATE DEBTS. DEFENDANT HAS NOT DONE ANY OF THIS. IN EXHIBIT C I HAVE ATTACHED THE LAWSUITS AND JUDGEMENTS THAT SO FAR HAVE GONE AGAINST ME DUE TO DEFENDANTS GROSS ABUSE OF MY FUNDS FOR HIS OWN PERSONAL LEISURE/PLEASURES AND NOT FOR THE SERVICES HE WAS PAID TO USE MY FUNDS FOR

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA

COUNTY OF LAKE

Subscribed and sworn to (or affirmed) before me on this 1 day of October,
2024, by SYDNEY SMITH, proved to me on the basis of satisfactory evidence to be the person who appeared before me.



(Signature)

SYDNEY SMITH

Signature Carla Kozlowski
(Seal)

NOTARY PUBLIC

My Commission expires:

12/11/2027



Carla Kozlowski
Notary Public, State of Ohio
My Commission Expires
December 11, 2027

Affidavit

Page 3 of 3

Debt Resolution Program Update

Exhibit A

From: noreply@setforth.com
To: pimpspitta@yahoo.com
Date: Friday, January 13, 2023 at 07:49 PM EST



Program Update

Dear Sydney,

We wanted to reach out and thank you for your ongoing commitment to our program. When you began, we sent disputes to each of the three major credit bureaus – Experian, Equifax, and TransUnion – and to your original creditors, disputing each of the debts you enrolled with us.

At this point in the program, we are continuing to follow up with the creditors regarding those disputes that the credit bureaus do not already resolve in your favor.

In the dispute letters to your original creditors, we are requesting they provide adequate documentation to support their legal right to collect the debts you enrolled. We will wait for their response and continue the dispute process until it is complete.

It is important to keep an eye out for any response via physical mail over the next several weeks because of our time-sensitive response deadlines.

Your participation throughout this process is important.

Here are two areas we need your help:

1. If you receive any calls from creditors or collectors, inform them of your legal representation with us then hang up. If you are being harassed by a collector, keep a record of those calls, and report them to us immediately so that our attorneys can take legal action.
2. If you receive any letters or correspondence such as collection letters, legal documents, or results from the credit bureaus, make sure to send this to us immediately as it may be time sensitive. Upload them here or email them to support@lpglaw.com.

It has been a pleasure working with you so far, and we look forward to continuing this process together.

We Are Here for You.

Exhibit A

Are you being harassed by creditors or collectors?
[Report it here.](#)

Want to set an appointment to talk?
[Schedule it here.](#)

Questions about the program?
[Visit our website.](#)

To speak with a team member, call (949) 229-6262
or visit our website to chat with us.



CONFIDENTIALITY AND DISCLAIMER NOTICE: This email is intended for clients of the Litigation Practice Group; also known as LPG. LPG is a debt resolution law firm, not a debt settlement company. We do not settle, consolidate, reduce, or pay your debts or offer any sort of loans or financing. Just a reminder that you are receiving this email because you are our client. This e-mail and any attachments are intended for the exclusive use of the intended recipient. If you are not the intended recipient, please delete this email. If you received this email in error, please notify the sender immediately by calling (877) 697-1080, then delete this e-mail and any attachments. Any authorized use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. Nothing contained in this email shall form the basis of an attorney-client relationship or constitute a waiver of any privilege.

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A Message from your Attorneys

From: noreply@debtppaypro.com
To: pimpspitta@yahoo.com
Date: Friday, September 16, 2022 at 12:39 PM EDT

Exhibit A



A Message from your Attorneys

Dear Sydney,

Thank you for completing your verification call with the Litigation Practice Group. In the video below, Israel, one of our lead attorneys, welcomes you into our program. This short conversation with Israel will help set you up for success as he further explains the services we will provide.

It is important that you save this video and refer to it when needed as it provides an overview of our program. In the next couple of days, you will receive additional information about your enrollment and what the next steps will be.



Thank you for trusting us as your attorneys. If you have any questions, please contact us via phone at (949) 229-6262 or via email at support@lpglaw.com.

We look forward to working with you!

Exhibit A



CONFIDENTIALITY AND DISCLAIMER NOTICE: This email is intended for clients of the Litigation Practice Group; also known as LPG. LPG is a debt resolution law firm, not a debt settlement company. We do not settle, consolidate, reduce, or pay your debts or offer any sort of loans or financing. Just a reminder that you are receiving this email because you are our client. This e-mail and any attachments are intended for the exclusive use of the intended recipient. If you are not the intended recipient, please delete this email. If you received this email in error, please notify the sender immediately by calling (877) 697-1080, then delete this e-mail and any attachments. Any authorized use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. Nothing contained in this email shall form the basis of an attorney-client relationship or constitute a waiver of any privilege.

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Litigation Practice Group - Welcome Packet

From: noreply@debtpro.com
To: pimpspitta@yahoo.com
Date: Friday, September 16, 2022 at 08:29 PM EDT

Exhibit A



Welcome to Our Program

Dear Sydney,

Welcome to The Litigation Practice Group! Our attorneys are committed to providing you with the best service possible and we hope to make our working relationship a success. Our goal is to answer your questions while helping you achieve financial freedom.

You will be receiving a call from one of our representatives to explain our program in detail. It is essential that you complete this call to get the process started to ensure success throughout our program.

Click this link below to view the Welcome Packet which includes a letter from our lead attorney, Dan March, instructions on how to set up your Customer Portal, and more!

[Welcome Packet](#)

Thank you for trusting us as your attorneys. Our customer support team is available Monday through Friday, 8AM to 6PM PST. You can contact us via phone at (949) 229-6262 or via email at support@lpglaw.com.

We look forward to speaking with you soon.

We Are Here for You.



Exhibit A

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✗ Kaleidoscope ✗ Mail - Junior L Smith - Outlook ✗ (i) Omni - eClaims Home - Cmrv ✗ 1099-3e7-1e11-4b71-8d02-8c ✗ 1099-3e7-1e11-4b71-8d02-8c ✗ +

king.huntington.com/Retail/AccountServices/AccountDetails/Index/67530040

Exhibit B

Scheduled Transfers & Payments

Download Transactions

Date Range
Custom Range

Advanced Search

Table View

Simple

Detailed

ADVANCED SEARCH FILTERS Clear Filters

Date: From 05/01/2022 to 01/25/2024 Type: Electronic Debit Amount: From \$560.00 to \$570.00

Date	Description	Type	Amount	Balance
08/14/23	PHXLAW 4246224044	Electronic Debit	-\$565.68	
07/03/23	PHXLAW 4246224044	Electronic Debit	-\$565.68	
05/31/23	LGS HOLDCO LLC ACH Collec	Electronic Debit	-\$565.68	
05/01/23	LEGAL FEE Phcenix La	Electronic Debit	-\$565.68	
03/03/23	LPG 949-229-6262 DIRECT PAY	Electronic Debit	-\$565.68	
01/31/23	LPG 949-229-6262 DIRECT PAY	Electronic Debit	-\$565.68	
01/03/23	LPG 949-229-6262 DIRECT PAY	Electronic Debit	-\$565.68	
12/01/22	LPG 949-229-6262 DIRECT PAY	Electronic Debit	-\$565.68	
11/01/22	LPG 949-229-6262 2721444451	Electronic Debit	-\$565.68	
10/03/22	LPG 949-229-6262 2721444451	Electronic Debit	-\$565.68	

VIEW A REPORT >

EDIT TRANSACTIONS >

W G J

Exhibit C

IN THE MENTOR MUNICIPAL COURT
LAKE COUNTY, OHIO

LVNV FUNDING LLC) CASE NUMBER: CVF2400739
Plaintiff)
vs.) JUDGE:
SYDNEY SMITH)
8990 HENDRICKS RD)
MENTOR, OH 44060-2142)
Defendant)

CONSENT JUDGMENT ENTRY

UPON AGREEMENT OF THE PARTIES, Judgment is granted in favor for the Plaintiff, LVNV Funding LLC, and against Defendant, Sydney Smith, in the sum of \$2,022.33, less payment(s)/credit(s) of \$85.00, plus the costs of the within action in the amount of \$115.00 for a total of \$2,052.33, with interest to accrue at the statutory rate of 8.00% per annum.

Plaintiff agrees not to execute on said Judgment, other than the filing of a Judgment Lien, so long as said Defendant(s) pay the full amount as follows: initial payment of \$85.00 due on October 27, 2024, followed by recurring monthly payments of \$85.00 beginning on November 27, 2024 and continuing on or before the 27th of each month.

All payments must be made payable to Stenger & Stenger, P.C., and received at the office of Stenger & Stenger, P.C., 2618 East Paris Avenue Se, Grand Rapids, MI 49546 by the due date(s) herein. Payments may be made by phone at (888) 305-7775 or online at www.paystenger.com.

Defendant agrees to fully and forever release, acquit, and discharge Plaintiff, its heirs, agents, representatives, attorneys, employees, directors, officers, partners, subsidiaries, affiliates, successors and assigns from any and all liability or causes of action that the Defendant may have now or in the future, for alleged violations of any Federal or State statutes, law or common law, arising out of or in connection with the facts and circumstances surrounding this action.

If the Defendant fails to submit any payment on time or for the full amount, Plaintiff shall have the right to commence execution proceedings for the full judgment amount which is then due and owing, including court costs and interest, without further order of this Court. Acceptance of a late payment does not constitute a waiver of Plaintiff's right to institute execution proceedings. There is no just reason for delay.

IT IS SO ORDERED.

Judge

APPROVED BY:

Dated: _____

Anthony J. Huspaska (OSCR#: 0087618)
Joseph M. Jammal (OSCR#: 0096514)
David B. Bokor (OSCR#: 0061515)
Gina M. Nennig (OSCR#: 0083485)
Nathan J. Allen (OSCR#: 0100653)
David J. Hoff (OSCR#: 0083886)
Attorney for Plaintiff

Dated: _____

Sydney Smith, Defendant

Filing # 190775 / 23CV001629 / O'DONNELL, JOHN R LAKE COUNTY COMMON PLEAS COURT
Lake Co Common Pleas Court Clerk, Faith Andrews 07/09/2024 09:06 AM

Exhibit C

PLAINTIFF

Case #23CV001629

v.

Sydney Smith

DEFENDANT(S).

AGREED JUDGMENT ENTRY

Upon agreement of the parties, the Court hereby awards judgment in favor of Plaintiff, LOAN ASSET ISSUER LLC, and against Defendant, Sydney Smith, in the amount of Fifteen Thousand Four Hundred Sixty-One and 86/100 Dollars (\$15,461.86) plus interest at 5% per annum from the judgment date, and the court costs of this action.

In satisfaction of this judgment, Plaintiff will accept \$8,505.00, payable as follows: \$236.00 by June 25, 2024, and like payments due on the same day of each consecutive month thereafterthrough April 25, 2027; thereafter \$245.00 is due on May 25, 2027, until a total of \$8,505.00 is paid. Provided that Defendant does not default on payment of said obligation as provided for herein, Plaintiff agrees to forbear from executing on its judgment against Defendant except for filing of a certificate of judgment with the Common Pleas Court and filing a proof of claim with the Probate Court, if necessary. Payments shall be made payable to Levy & Associates, LLC, and either mailed to P.O. Box 182423, Columbus, OH 43218-2423 (or if sending by overnight delivery to our physical address at 2489 Stelzer Road, Ste 100, Columbus, OH 43219), made over the phone by calling toll free at (866) 767-3538 between 8 am and 5 pm EST, or online by navigating to www.levylawllc.com, and clicking on the Make A Payment link. IF ANY INSTALLMENT OR ANY PART THEREOF REMAINS UNPAID FOR FIVE (5) DAYS AFTER ITS DUE DATE, THEN WITHOUT FURTHER ACTION OF THE COURT, THE FULL AMOUNT OF THE JUDGMENT PLUS COURT COSTS AND ACCRUED INTEREST AT THE RATE OF 5% PER ANNUM THEREUPON LESS PAYMENTS MADE SHALL BECOME IMMEDIATELY DUE AND PAYABLE. The parties agree that acceptance by the Plaintiff of any payment made after it becomes due shall not constitute a waiver of the timeliness requirement concerning that payment, nor any future payment.

Ed Sarver

EMI Endere (#0081407)
 Eden R. Levy (#0000000)

Eden Sarver (#0074919)
Kimberly A. Klemenok (#0069046)
O Crystal M. Duplay (#0084600)
Levy & Associates, L.L.C.
P.O. Box 182423
Columbus, OH 43218-2423
Tel: (614) 898-5200
legallevylawfirms.com
Attorneys for Plaintiff
E6-83409

Sydney Smith

Sydney Smith
8990 Mentor KS RA

Mentor OH 44060
Defendant



John P O'Donnell

Judge John P. O'Donnell

